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10 Attorneys for Defendant
11 JOHNSON & JOHNSON LONG-TERM
12 DISABILITY INCOME PLAN

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KATHLEEN VANBUSKIRK,

Plaintiff,

vs.

JOHNSON & JOHNSON LONG-
TERM DISABILITY INCOME
PLAN,

Defendant.

Case No.: C07-01970CRB

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE
AND SUPPORTING
DECLARATION OF MARK A.
NEUBAUER, ESQ.**

[Local Rules 6-1(b) and 6-2(a)]

Judge: Hon. Charles R. Breyer

1 Pursuant to the United States District Court's Civil Local Rules 6-1(b) and
2 6-2(a), Plaintiff Kathleen Vanbuskirk ("Plaintiff") and Defendant Johnson &
3 Johnson Long-Term Disability Income Plan ("Defendant"), through their
4 respective counsel of record, HEREBY STIPULATE and agree that the initial
5 Case Management Conference in this matter be continued from July 13, 2007 at
6 8:30 a.m. to July 20, 2007 at 8:30 a.m., as Defendant's trial counsel will be out of
7 state on a long-planned occasion with his family, and therefore unavailable to
8 appear in Court on July 13, 2007.

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10 Dated: June 13, 2007

STEPTOE & JOHNSON LLP

Mark A. Neubauer

Katessa C. Davis

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By Katessa C. Davis

15 KATESSA C. DAVIS

16 Attorneys for Defendant

17 JOHNSON & JOHNSON LONG-TERM
DISABILITY INCOME PLAN

18

19

Dated: June 13 2007

LEWIS, FEINBERG, LEE, RENAKER &
JACKSON

20 Cassie Springer-Sullivan

21 Michelle Roberts

22

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By Cassie Springer-Sullivan

24 CASSIE SPRINGER-SULLIVAN

25 Attorney for Plaintiff

26 KATHLEEN VANBUSKIRK

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DECLARATION OF MARK A. NEUBAUER

I, Mark A. Neubauer, declare as follows:

4 1. At all relevant times herein, I am and have been a partner in the law
5 firm of Steptoe & Johnson LLP, counsel of record for Defendant Johnson &
6 Johnson Long-Term Disability Income Plan (“Defendant”) in this matter, and I am
7 and have been one to the lawyers at my firm primarily responsible for this matter.
8 I have personal knowledge of all of the facts set forth in this Declaration, and if
9 called and sworn as a witness at trial or at any other proceeding before this Court,
10 I could and would competently testify as set forth herein.

Good Cause Exists for the Enlargement of Time

12 2. I am the trial counsel for Defendant in this matter and I will
13 participate in the early meeting of counsel. I want to appear at the Case
14 Management Conference on behalf of Defendant in this matter. However, I am
15 unable to attend the Case Management Conference currently scheduled on July
16 13, 2007, as I am scheduled be out of the state of California on that date at our
17 cabin in Eagle River, Wisconsin, on a long-planned vacation with my wife and
18 five daughters.

19 3. Therefore, Defendant requests that the Case Management Conference
20 be continued for only one week, from July 13, 2007 at 8:30 a.m. to July ~~20~~²⁷, 2007
21 at 8:30 a.m. so that I may attend.

22 4. Plaintiff's counsel does not object to the one week continuance of the
23 Case Management Conference.

24 5. Except for an extension of the time for Defendant to respond to
25 Plaintiff's complaint, there have not been any previous time modifications in this
26 case.

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6. An order continuing the Case Management Conference for one week,
from July 13, 2007 to July ~~20~~²⁷, 2007, will not effect the schedule of the case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13th day of June, 2007 at Los Angeles, California.

Mark Neubauer
MARK A. NEUBAUER

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 18, 2007

The Honorable C

IT IS SO ORDERED
EB
Charles R. Breye

Judge Charles R. Breyer